



Attached hereto and made part of this petition is a Technical Exhibit in support of the requested allotment. Based on the information contained therein, it appears that the requested channel could be allotted to Nantucket, Massachusetts in compliance with the minimum distance separation requirements of §73.207(b) of the Commission's rules.<sup>2</sup>

Reference Coordinates are:

41-17-12 North Latitude (NLAT)  
70-06-06 West Longitude (WLONG)

Should this petition be granted, and Channel 249A be allotted to Nantucket, Massachusetts, Petitioner will apply for Channel 249A and after it is authorized, will promptly construct the new facility.

In accordance with Section 1.52 of the Commission's Rules and Regulations, I hereby certify that I have examined the foregoing Petition for Rule Making and the attached Technical Exhibit, and that both are true and correct to the best of my knowledge and belief.

WHEREFORE, it is respectfully requested that the instant petition be granted and that the FM Table of Allotments, section 73.202(b) be amended as requested herein.

Respectfully submitted,



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April 20, 2004

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<sup>2</sup> See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992)

## **TECHNICAL EXHIBIT**

IN SUPPORT OF  
PETITION FOR RULE MAKING  
NEW FM – CHANNEL 249A  
NANTUCKET, MASSACHUSETTES

PAUL B. CHRISTENSEN  
PETITIONER

### **INTRODUCTION**

This Technical Exhibit supports the petition by Paul B. Christensen (hereinafter “Petitioner”), who seeks to amend the FM Table of Allotments, §73.202(b) of the Federal Communications Commission’s Rules, by allocating FM Channel 249A to Nantucket, Massachusetts as that community’s second local FM aural service.

### **ALLOCATION**

A comprehensive engineering study was performed, utilizing the current FCC/NTIS database to determine the feasibility of allocating FM Channel 249A to Nantucket, Massachusetts, subject to the §73.207(b) minimum distance requirements of the Commission’s Rules. The study incorporates all applicable co-channel, adjacent-channel, and intermediate-frequency separations. The results of the study indicate that FM Channel 249A may be allocated to Nantucket in full compliance with §73.207(b).

Attached hereto as Exhibit A is an “area-to-locate” study for FM Channel 249A. The Exhibit depicts the required protection contours from all relevant co-channel, adjacent channel, and intermediate-frequency-limited stations and allocations. As indicated,

ample area exists immediately in and near the community boundary in which the proposed facilities may be located

Assuming a maximum effective radiated power of six (6) Kilowatts and the installation of an omni-directional antenna placed at one hundred (100) meters above average terrain, the proposed transmission facilities could be located in or near the community's boundaries while maintaining the requisite city-grade (70 dBu) coverage contour over the entire city, in full compliance with §73.315(a) and (b). Attached hereto and presented as Exhibit B is a graphical representation of a city-grade service contour from the Petitioner's geographical reference coordinates, located within the permissible area-to-locate geographical area.

### **CONCLUSION**

As demonstrated herein, the proposed amendment to the FM Table of Allotments can be achieved in compliance with §73.207(b), and §73.315(a) and (b) and will not create a short-spacing condition to any existing station, pending application, or vacant allotment, nor will the amendment result in the reallocation of any station, pending application or vacant allotment.

# EXHIBIT A

## 73.207 Analysis

Job Nantucket fmj

Master Database:

Lat: N41 17.12 Lon W070:06:06 NAD-83

Scale 1 500000

Channel. 249 Class. A

Status Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range 100 km, Clearance: -0.5km

Comments: No Comments

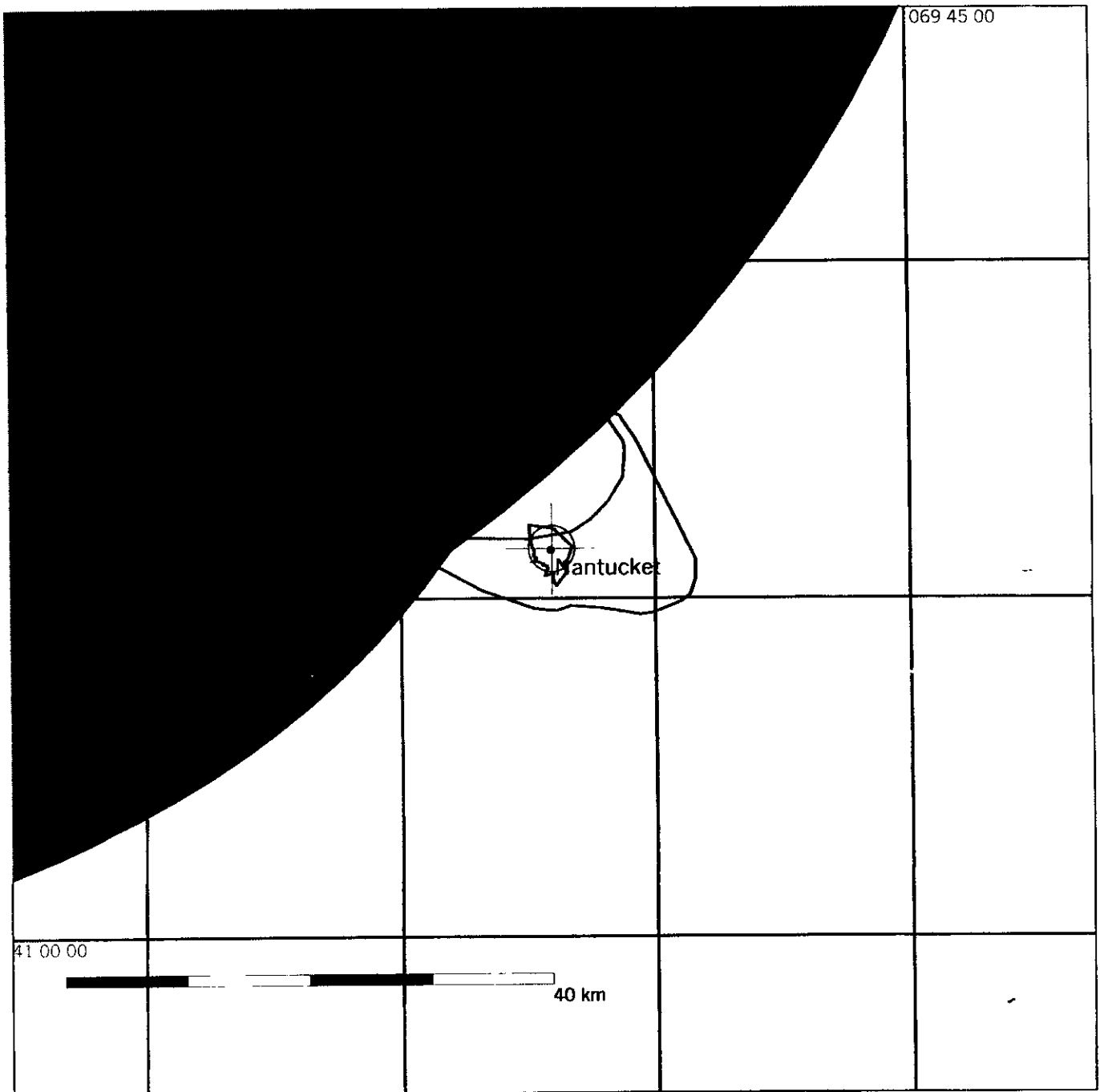
Description:

Date: 11/18/02 1:42:07 PM

Key:

Short

Clear



# EXHIBIT B

## Contour Analysis

Job Nantucket.fmj

Master Database

Lat: N41.17:12 Lon. W070:06:06 NAD-83

Scale 1 750000

Channel 249 Class A

Status Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 100 km, Clearance: -0.5km

Comments: No Comments

Description

Date: 11/18/02 1:42:23 PM

Key:

Protected

2nd 3rd Adj

